Department of Toxic Substances Control

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CALIFORNIA ENVIRONMENTAL QUALITY ACT
Draft
NEGATIVE DECLARATION

Project Title:
SOIL REMEDIATION and a POST-CLOSURE PERMIT FOR EXPANSION of the UNIT ONE LANDFILL (CORRECTIVE ACTION MANAGEMENT UNIT)
USS-POSCO INDUSTRIES
900 Loveridge Road
Pittsburg, CA 94565

State Clearinghouse Number:

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Project Location: 900 Loveridge Road, Pittsburg, CA 94565, Contra Costa County

Project Description:

In accordance with the California Health and Safety Code, Chapter 6.5, Section 25100 et seq., a corrective action remedy is being proposed by the Department of Toxic Substances Control (DTSC) at USS-POSCO Industries. As part of that remedy, UPI has submitted an application for a post-closure permit for a non-RCRA Corrective Action Management Unit (CAMU) to be located within the existing USS-POSCO plant. The area within the USS-POSCO plant site to be designated as a CAMU is Unit I, a closed hazardous waste landfill within Site L-B. USS-POSCO has proposed creating the CAMU by expanding Unit I for wastes regulated by California as hazardous waste but not

regulated by the United States Environmental Protection Agency (U.S. EPA).1 The landfill was closed and a post-closure maintenance plan was approved by DTSC on December 28, 1995.

A Consent Agreement for implementation of corrective action was entered into by USS-POSCO and DTSC in June 1998. Upon approval of the remedies for the SWMUs addressed by this project, a new consent agreement will be entered into between USS-POSCO and DTSC which will be updated to reflect the conditions and time constraints for implementing those remedies. In addition, the consent agreement will lay out the remaining steps required for remediation of SWMUs not addressed in this project and remediation of groundwater.

The planned CAMU (hereafter referred to as the Unit I CAMU, which will be authorized by the proposed issuance of a Post-Closure Permit, is proposed to receive materials/soils from only those SWMUs that: (1) have been shown not to be a threat to groundwater; and (2) have been tested to contain contaminants at levels below RCRA criteria for hazardous wastes and therefore not regulated by the U.S. Environmental Protection Agency. Materials/soils not meeting this criteria will be directed to appropriate off-site disposal facilities.

The proposed project includes all corrective action, including excavation of soils/materials, transportation of soils/materials, opening and closing of the Unit 1 CAMU and the associated Post-Closure Permit, off-site disposal of certain wastes, deed restrictions, and post-closure maintenance of the Unit 1 CAMU. USS-POSCO submitted a RCRA Corrective Measures Study Workplan and Report to DTSC with proposed corrective action remedies for soils at this site. The proposed RCRA Corrective Action Remedy Selection for soils remediation and post-closure maintenance project consists of the following activities:

1. **Reopening Unit 1, the CAMU, into which non-Resource Conservation and Recovery Act (non-RCRA) wastes from Sites L-A and SWMU No. 3 in the active portion of the facility will be placed for final disposal. A Post-Closure Permit is proposed for issuance to authorize the construction and operation of the CAMU.**

   Unit I will be expanded both laterally and vertically to accommodate the wastes from Sites L-A and SWMU No. 3 in the active portion of the facility. Lateral expansion will occur to the south over an approximate two-acre area, with a 50-foot set back from the fence line. The resulting Unit I CAMU footprint will be approximately 10 acres. Vertical

1 In February 1993, the U.S. EPA issued the final rule for CAMUs, Corrective Action Provisions under Subtitle C (Federal Register, Volume 58, page 8658). California adopted regulations [California Code of Regulations, Title 22 (22 CCR), Division 4.5, Chapter 14, Section 66264.552] equivalent to the federal CAMU rule on June 29, l995.

expansion will be approximately 9 feet (el. 39.5 above sea level to el. 48.0), with side slopes lengthened by 50 feet on the south slope and by 60 feet on the north slope. Slope stability analysis will be in accordance with California Code of Regulations, Titles 22 and 27.

- The cap and vegetative cover will be removed from the Unit I landfill, and the Unit will be graded to provide for drainage from the unit by natural gravity flow toward the north and west into the storm water retention basin (SWRB). Lined gutters will be installed so that stormwater collected will be conveyed down the side slopes of the Unit I CAMU in corrugated metal pipes. Stormwater run-off from the south side of the unit would be collected by a drainage channel and would drain from the south side of the unit around the southwest corner of the unit and from there to the north into the SWRB. An access road parallel to this drainage channel will also be constructed.

- An engineered cap for the Unit I CAMU will be installed. Following completion of remediation material/soil consolidation activities, remediation material/soil placed in the Unit I CAMU will be closed in place via construction of an engineered final cover consisting of, from bottom to top: a foundation layer (compacted dried sludge), a geosynthetic clay layer, a geosynthetic drainage layer, a filter fabric, and a vegetation/soil layer. The new geosynthetics layer will overlap, in a shingle effect, the remaining Unit I geosynthetics layer (in areas not receiving remediation material/soil) by a minimum of three feet;

- A final drainage system for the Unit I CAMU will be designed to perform three major functions:

    (1) facilitate the removal of precipitation on the closed Unit I CAMU in order to minimize infiltration and erosion of the final cover;

    (2) collect runoff from the Unit I CAMU in the existing SWRB to prevent the runoff from leaving the site area; and

    (3) divert drainage from adjacent areas to prevent run-on onto the Unit I CAMU closure area.

- New groundwater monitoring wells will be installed. These new wells and existing wells will be monitored to detect any impact to groundwater from the Unit 1 CAMU landfill.

2. Excavating contaminated material/soil from selected SWMUs located within the USS-POSCO plant Sites L-A and SWMU No. 3 in the active portion of the facility and transporting the excavated material/soil to the Unit I CAMU for disposal.

Approximately 95, 000 cubic yards of contaminated material/soil will be excavated from the following solid waste management units (SWMUs) for transfer to the Unit 1 CAMU:

- No. 3: Former Caustic Neutralization Area;
- No. 24.1: Site L-A – Dried Sludge Disposal Areas;
- No. 24.3: Site L-A – Lead Scale Disposal Area (East portion only);
- No. 24.5: Site L-A – Oil Disposal Areas (ODA #3); and
- No. 24.8: Site L-A – Lead Impacted Area.

- Remediation material/soil from the Dried Sludge Disposal Areas (SWMU 24.1) will be excavated and transported by truck directly to the Unit I CAMU (without stockpiling).

- Remediation material/soil from the remaining SWMUs will be excavated, stockpiled (for purposes of collecting and analyzing samples to verify that the remediation material/soil is not RCRA or containing any PCBs and then trucked to the Unit I CAMU.

- Remediation material/soil stockpiles will be placed on a plastic liner, surrounded by a berm, covered with plastic sheeting and secured, as necessary, with sandbags (or secured by other appropriate means).

3. Transport of wastes to appropriate off-site regulated treatment/disposal facilities.

- Material/soil from the remediation of the following SWMUs will be directed to appropriate off-site regulated treatment/disposal facilities:

- No. 17.1: Former Power Substation #1 Area; and
- No. 24.5: Site L-A – Oil Disposal Areas (ODA #1 and 4).

Remediation material/soil from these SWMUs will be excavated, stockpiled (for purposes of collecting and analyzing samples for waste profiling purposes), and then trucked to the off-site regulated treatment/disposal facilities. The approximate volume of each area is as follows:

- No. 24.3: Central Area – Site L-A Lead Scale Disposal Areas
- No. 17.1: Former Power Substation No. 1 Area: 21 cubic yards; and
- No. 24.5: Site L-A – Oil Disposal Areas #1: 100 cubic yards.

4. Post-Closure Maintenance of the Unit I CAMU

Post-closure maintenance, as specified in the Unit I Post-Closure Permit Application will

be maintained throughout the CAMU post-closure period. Systems requiring maintenance will include: groundwater monitoring, final cover, drainage, and security. These systems will be inspected monthly.

Findings of Significant Effect on Environment:

The Department of Toxic Substances Control (DTSC) has prepared an Initial Study pursuant to the requirements of the California Environmental Quality Act (CEQA, Section 21000 et seq., California Public Resources Code) and implementing Guidelines (Section 15000 et seq., Title 14, California Code of Regulations). Based upon this analysis, DTSC has determined that the proposed project will not have a significant effect upon the environment.

Mitigation Measures:

DTSC has determined that the project does not require any additional mitigation measures beyond those incorporated as part of the project description.

Andrew Berna-Hicks	**Project Manager**	**Date**
Mohinder S. Sandhu	**Chief, Permitting Unit**	**Date**